

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**ANYWHERECOMMERCE, INC. and  
BBPOS LIMITED,  
Plaintiffs,**

**v.**

**INGENICO INC., INGENICO CORP.,  
and INGENICO GROUP SA,  
Defendants.**

**Civil Docket No: 1:19-cv-11457-IT**

**Jury Trial Demanded**

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**PLAINTIFFS' TRIAL WITNESS LIST<sup>1</sup>**

Pursuant to the Court's Second Amended Procedural Order re: Pretrial/Trial dated March 29, 2023 (Doc. No. 229), Plaintiffs / Counterclaim Defendants BBPOS Limited ("BBPOS") and AnywhereCommerce, Inc. ("AC") (together, "Plaintiffs"), by and through their attorneys, respectfully submit the following Trial Witness List:

**I. TRIAL WITNESSES THAT ARE EXPECTED TO BE PRESENTED<sup>2</sup>:**

1. Ben Lo  
c/o Kutak Rock LLP

2. Jimmy Tang  
c/o Kutak Rock LLP

3. Will Graylin  
14 Robinson Park, Winchester, MA 01890  
(781) 521-0755

Note: Service of Subpoena to Attend and Testify at Trial dated March 29, 2023, effected on March 30, 2023.<sup>3</sup>

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<sup>1</sup> Plaintiffs reserve the right to amend, revise, and supplement this trial witness list through the conclusion of trial in this action pursuant to the Court's Procedural Orders re: Pretrial/Trial, as revised, by way of rebuttal / impeachment, and/or consistent with further Orders and Rules of Court.

<sup>2</sup> As to the three witnesses identified above under the control of Defendants' counsel, Adler Pollock & Sheehan P.C. – each of whom Defendants had designated to testify and submit to Rule 30(b)(6) depositions in the case – Plaintiffs expected and had understood that they would be available to attend and testify at trial, if called. To the extent that it is hereafter confirmed / determined that one or more of these witnesses are unavailable, Plaintiffs respectfully seek leave to prepare and file deposition designations within 48 hours' notice thereof.

<sup>3</sup> A true and correct copy of subpoena service package attached as Exhibit A.

4. Christopher Rotsaert  
c/o Adler Pollock & Sheehan P.C.
5. Victor Young  
c/o Adler Pollock & Sheehan P.C.
6. David Szezpanski  
c/o Adler Pollock & Sheehan P.C.
7. Michael Kron  
c/o Kutak Rock LLP
8. Ivan Zatkovich  
c/o Kutak Rock LLP
9. Steve Scherf  
c/o Kutak Rock LLP

**II. TRIAL WITNESSES THAT MAY BE CALLED, IF THE NEED ARISES:**

1. Corporate Designee(s) for Defendants  
c/o Adler Pollock & Sheehan P.C.
2. Ken Paull  
135 Nicholas Road  
Cohasset, MA 02025  
(678) 523-8254
3. Mitchell Cobrin  
c/o Kutak Rock LLP
4. Daniel Tsai  
c/o Kutak Rock LLP
5. Any other witness identified by any other parties

Plaintiffs reserve the right to supplement the foregoing and call any witness for the purposes of rebuttal and/or impeachment, as necessary.

Respectfully submitted:

/s/ Melissa A. Bozeman  
By: Melissa A. Bozeman (Pro Hac Vice)  
Pennsylvania Bar No. 201116

Oliver D. Griffin (Pro Hac Vice)  
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and

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rcedillo@lawdcm.com

Dated: March 31, 2023.

*Attorneys for Plaintiffs / Counterclaim-Defendants*

**CERTIFICATE OF SERVICE**

I, Melissa A. Bozeman hereby certify that I have served a true and correct copy of the foregoing Trial Witness List this 31<sup>st</sup> day of March, 2023, upon all counsel of record via the Court Electronic Filing System, CM/ECF.

/s/ Melissa A. Bozeman  
Melissa A. Bozeman